

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re: )  
THE FINANCIAL OVERSIGHT AND ) PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO ) Title III  
as representative of ) Case No. 17-BK-03283 (LTS)  
THE COMMONWEALTH OF PUERTO RICO, *et al.*, ) (Jointly Administered)  
Debtors.<sup>1</sup> ) **Re: ECF No. 17640**  
)

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**THE OFFICIAL COMMITTEE OF RETIRED EMPLOYEES' MOTION TO INFORM  
REGARDING FINALIZED WITNESS AND EXHIBIT LIST  
IN CONNECTION WITH CONFIRMATION HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

In connection with the Court's August 2, 2021 Order [Dkt. 17640], the Official Committee of Retired Employees (the "**Retiree Committee**"), hereby files this Motion to Inform to identify (i) Dr. Simon Johnson, MIT Sloan School of Management, 100 Main St., Cambridge, MA 02142, as an expert witness in connection with the confirmation hearing of the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico [Dkt. 17627] as may be amended

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(the “**Plan**”)<sup>2</sup>; and (ii) Dr. Johnson’s expert report and accompanying appendices [Dkt. 18093], as an exhibit for the confirmation hearing. In accordance with this Court’s October 14, 2021 Order [Dkt. 18502], the Retiree Committee reserves the right to later identify any witness or exhibit the Retiree Committee may use at the confirmation hearing for the purposes of cross-examination or rebuttal.

Dated: October 22, 2021

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By:

/s/ Robert Gordon

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<sup>2</sup> The Retiree Committee previously disclosed Dr. Johnson as its expert witness on September 6, 2021 [Dkt. 18046].